

Action asserted against the Defendants in the Master Complaint:

- ☒ COUNT I: NEGLIGENCE AND GROSS NEGLIGENCE (Against Liberty)
- ☒ COUNT II: NEGLIGENCE AND GROSS NEGLIGENCE (Against UniFirst)
- ☐ COUNT III: NEGLIGENCE AND GROSS NEGLIGENCE (Against Clinic Related Defendants)
- ☐ COUNT IV: VIOLATION OF CONSUMER PROTECTION STATUTES (Against Clinic Related Defendants)
- ☐ COUNT V: VIOLATION OF M.G.L. C. 93A (Against Liberty)
- ☐ COUNT VI: VIOLATION OF M.G.L. C. 93A (Against UniFirst)
- ☐ COUNT VII: BATTERY (Against Clinic Related Defendants)
- ☐ COUNT VIII: FAILURE TO WARN (Against Clinic Related Defendants)
- ☐ COUNT IX: TENNESSEE PRODUCT LIABILITY CLAIMS (Against Tennessee Clinic Related Defendants)
- ☐ COUNT X: AGENCY (Against Clinic Related Defendants)
- ☐ COUNT XI: CIVIL CONSPIRACY (Against Clinic Related Defendants)
- ☐ COUNT XII: WRONGFUL DEATH PUNITIVE DAMAGES (Against Each Defendant)
- ☐ COUNT XIII: LOSS OF CONSORTIUM (Against All Defendants)
- ☐ COUNT XIV: PUNITIVE DAMAGES (Against All Defendants)

5. Plaintiff Maria Leticia Lumbreras has suffered pain and suffering, emotional distress and medical expenses.

6. WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendants awarding compensatory damages, punitive damages, interest, costs of suit, and such further relief as the

Court deems equitable and just.

Plaintiff(s) reserve the right to amend this Complaint to add allegations and claims against individuals or entities currently omitted (in light of the Court's order permitting a Master Complaint naming defendants affiliated with NECC and currently participating in mediation by December 20) and to add or amend allegations against Defendants named herein based, in part, on further discovery.

JURY DEMAND

Plaintiff(s) hereby demand(s) a trial by jury.

Dated: December 20, 2013

Respectfully submitted,

/s/ Ronald Rodriguez
Ronald Rodriguez,
LAW OFFICE OF RONALD RODRIGUEZ
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Laredo, Texas 78040
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956/796-1002

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2013, I electronically filed the foregoing document with the Clerk for the United States District Court for the District of Massachusetts by using the Court's CM/ ECF system, which will automatically send email notification of such filing to all counsel of record and will likewise be available electronically to any attorneys of record who subsequently appear in this matter.

Respectfully submitted,

/s/ Ronald Rodriguez

Ronald Rodriguez